## JUN 0 5 2001

JUDY TREICHEL: My name is Judy Treichel. I'm the Executive Director of the Nevada Nuclear Waste Task Force.

I know that almost everyone who has stood up here has said that the deadline needs to be extended on this, and I certainly would agree with that, but I think an awful lot more is needed than just an extension of the deadline I was around and in this same job probably 12 years ago when the draft site characterization report was put out, and there was -- that site characterization plan bore almost no resemblance to the project that's going out there now.

When you look at this SDEIS and you see the size of the footprint, or the size of the area of a repository could be, that is totally different from anything that was ever intended to be characterized or ever has been characterized. When you look at things like the long-term aging facility, the blending facility, all of the things that go along with this, there was nothing in there about characterizing those.

When all of us showed up for scoping on doing an environmental impact study, none of these things were presented for people to even say that they should have been included in an Environmental Impact Statement. The entire project was a different project.

- So it seems to me that when everybody says, I'll submit comments, you're just sort of playing catch up.

  What needs to happen if this were going to be an honest project, an honest program, and following just even the very beginnings of a democratic process, there should be rules put in place. There should be an EPA standard in place. I understand one came out late today or is expected tomorrow.
- There should be siting guidelines. There should be a licensing rule. All of these things should have been finalized by using the public comments. I was at all of those hearings and there were a tremendous number of public comments, and we hear that they're just going along with what was proposed at that time and was highly opposed by the people of Nevada.

So what needs to happen is there needs to be rules in place, then somebody needs to come up with a site characterization plan that actually fits the project then we can go out for scoping on an Environmental Impact Statement.

And one of the things that I think should be considered and never has been looked at is the public opposition. What sort of problems does that bring about? If you have massive protests and you have a lot of people who are opposed to this project, and the state was opposed, which it obviously is because it said that

the use of the water is not within the public interest, but there could be a whole lot of other things that happen because you have an angry and opposed population. Those things should be looked  $\overline{at.}$ 

So I'm not sure that I will submit comments with or without the longer deadline because I have never seen any evidence that any of the many, many, comments that I and the task force have worked very hard on have ever been considered. So it would seem to me that we need to somehow or other find a place to start and then start with a decent process.

Thank you.

6